

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

**DOROTHY K. MARTIN,**

Plaintiff

vs.

**AVANT PUBLICATIONS, LLC d/b/a  
TIMES LEADER d/b/a TIMES  
LEADER MEDIA GROUP,**

Defendant

CIVIL ACTION

JURY TRIAL DEMANDED

**THE HONORABLE  
ROBERT D. MARIANI, JUDGE**

NO.: 3:22-CV-00276

**DEFENDANT'S MOTION TO DISMISS COMPLAINT**

The Defendant, **AVANT PUBLICATIONS, LLC, d/b/a TIMES LEADER**  
**d/b/a TIMES LEADER MEDIA GROUP**, by and through its legal counsel,  
pursuant to Federal Rule of Civil Procedure 12(b)(6), hereby files this Motion to  
Dismiss the Complaint in the above-captioned matter. The grounds for dismissal  
will be fully outlined and explained in a Memorandum of Law in support of this  
Motion. The Defendant requests oral argument on the Motion to Dismiss.

Respectfully submitted,  
**VINSKO & ASSOCIATES, P.C.**



---

**WILLIAM E. VINSKO, JR., ESQUIRE**

Atty. ID: 87739

**BRIAN M. VINSKO, ESQUIRE**

Atty. ID: 210215

37 North River Street

Wilkes-Barre, PA 18701

Phone: (570) 970-9700

Facsimile: (570) 970-9711

[wvinsko@vinsko.com](mailto:wvinsko@vinsko.com)

[bmvinsko@vinsko.com](mailto:bmvinsko@vinsko.com)

ATTORNEYS FOR DEFENDANT  
**AVANT PUBLICATIONS, LLC et. al.**

Dated: **APRIL 25, 2022**